

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND  
DEVELOPMENT,**

*Plaintiff,*

v.

**ONEPLUS TECHNOLOGY  
(SHENZHEN) CO., LTD.,**

*Defendant.*

**CIVIL ACTION NO. 6:20-CV-00952-ADA  
CIVIL ACTION NO. 6:20-CV-00953-ADA  
CIVIL ACTION NO. 6:20-CV-00956-ADA  
CIVIL ACTION NO. 6:20-CV-00957-ADA  
CIVIL ACTION NO. 6:20-CV-00958-ADA**

**JOINT STIPULATION TO EXTEND FACT DISCOVERY**

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos”) and Defendant OnePlus Technology (Shenzhen) Co. Ltd. (“OnePlus”), (collectively, “Parties”), hereby respectfully submit this Joint Stipulation to Extend Fact Discovery. The Parties have agreed to extend the fact discovery period to January 20, 2023 to allow for depositions and source code review to be completed. The fact discovery period will be extended to respond to or supplement responses to written discovery and to complete third-party discovery. The extension of fact discovery does not extend the previous deadline to serve further written discovery. All subpoenas and deposition notices to be served by August 31, 2022. The joint stipulation does not affect any other dates, including the dates for the pretrial conference or trial date.

Date: December 23, 2022

Respectfully Submitted,

By: /s/ Michael J. Lyons

Michael J. Lyons\*

California Bar No. 202284

michael.lyons@morganlewis.com

Ahren C. Hsu-Hoffman

Texas Bar No. 24053269

Ahren.hsu-hoffman@morganlewis.com  
Jacob J.O. Minne\*  
California Bar No. 294570  
jacob.minne@morganlewis.com  
Austin L. Zuck\*  
California Bar No. 318434  
austin.zuck@morganlewis.com  
**MORGAN, LEWIS & BOCKIUS LLP**  
1400 Page Mill Road  
Palo Alto, CA 94304  
T: 650.843.4000  
F: 650.843.4001

Elizabeth M. Chiaviello  
Texas Bar. No. 24088913  
elizabeth.chiaviello@morganlewis.com  
**MORGAN, LEWIS & BOCKIUS LLP**  
1717 Main Street, Suite 3200  
Dallas, TX 75201  
T: 214.466.4000  
F: 214.466.4001

\*Admitted *pro hac vice*

***Attorneys for Defendant OnePlus  
Technology (Shenzhen) Co. Ltd.***

By: /s/ Heather S. Kim  
Jonathan K. Waldrop (CA Bar No. 297903)  
(Admitted in this District)  
jwaldrop@kasowitz.com  
Darcy L. Jones (CA Bar No. 309474)  
(Admitted in this District)  
djones@kasowitz.com  
Marcus A. Barber (CA Bar No. 307361)  
(Admitted in this District)  
mbarber@kasowitz.com  
John W. Downing (CA Bar No. 252850)  
(Admitted in this District)  
jdowning@kasowitz.com  
Heather S. Kim (CA Bar No. 277686)  
(Admitted in this District)  
hkim@kasowitz.com  
**KASOWITZ BENSON TORRES LLP**  
333 Twin Dolphin Drive, Suite 200  
Redwood Shores, California 94065

Telephone: (650) 453-5170  
Facsimile: (650) 453-5171

Joshua A. Whitehill (NY Bar No. 4766473)  
jwhitehill@kasowitz.com

(*Pro hac vice* admission)

Howard L. Bressler (NY Bar No. 248379)

hbressler@kasowitz.com

(*Pro hac vice* admission)

Hershy Stern (NY Bar No. 4631024)

hsstern@kasowitz.com

(*Pro hac vice* admission)

Noah P. Dorman (DC Bar No. 1779821)

(Admitted *pro hac vice*)

ndorman@kasowitz.com

**KASOWITZ BENSON TORRES LLP**

1633 Broadway

New York, NY 10019

Telephone: (212) 506-1700

Facsimile: (212) 506-1800

Mark D. Siegmund (TX Bar No. 24117055)

mark@swclaw.com

**STECKLER WAYNE CHERRY & LOVE  
PLLC**

8416 Old McGregor Road

Waco, TX 76712

Telephone: (254) 651-3690

Facsimile: (972) 387-4041

*Attorneys for Plaintiff WSOU Investments,  
LLC d/b/a Brazos Licensing and Development*

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that on December 23, 2022, a true and correct copy of the foregoing instrument was served on all counsel of record who have appeared in this case via the Court's CM/ECF system per Local Rule CV-5.

/s/ Michael J. Lyons  
Michael J. Lyons